

FILED

APR 10 2024

5  
N/P

Gurpreet Singh  
2864 Hilltop Mall Road  
Richmond, California 94806  
Preet2325@yahoo.com  
Plaintiff, In Pro Per

CV 24

2162

KAW

CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
CALIFORNIA SAN FRANCISCO DIVISION

GURPREET SINGH,

Plaintiff,

vs.

Priyanka Chopra Jonas, Tiger Shroff, Disha  
Patani, Mouni Roy, Gippy Grewal,  
Jaswinder Singh Bains(Jazzy B), Salman  
Khan, Katrina Kaif, Neha Sharma, Aisha  
Sharma, Diljit Dosanjh, Sargun Mehta, John  
Abraham, Rakul Preet, Kiara Advani,  
Mishaal Advani, Nidhi Agrewal, Anil  
Kapoor, Sonal Chauhan, Akshay Kumar,  
Avneet Kaur, Ravi Dubey, Ranveer Singh,  
Deepika Padukone, Neha Kakkar, Anushka  
Sharma, Virat Kohli, Zareen Khan, Gauhar  
Khan, Parineeti Chopra, Shehnaz Gill,  
Sidharth Malhotra, Ranbir Kapoor, Alia  
Bhatt, Kareena Kapoor Khan, Saif Ali Khan

Defendant .

PLAINTIFF'S INITIAL COMPLAINT for  
Cyberbullying, Intentional Interference with  
Contract, False Advertising, Intentional  
Misrepresentation, Conspiracy, Intentional  
Torts, Unfair Competition, Civil Rights  
Violations, Stalking, Identity Theft,  
Harassment, Cyberstalking, Emotional  
Distress Damages, Civil Conspiracy,  
Negligent Infliction of Emotional Distress,  
Trespass to Chattels, Unlawful Surveillance,  
Intentional Interference with Prospective  
Economic Advantage, Violation of Right to  
Publicity, Intentional Trespass, Violation of  
California's Anti-Cyberharassment Laws,  
Violation of California's Consumer  
Protection Laws, Violation of California's  
Online Impersonation Laws, Violation of  
California's Anti-SLAPP Laws, Violation of  
California's Data Privacy Laws, Violation of  
California's Anti-Bullying Laws, Violation of  
California's Online Privacy Laws, Violation  
of California's Defamation Laws, Violation of  
California's Intentional Interference with  
Economic Relations Laws, Violation of  
California's Anti-Discrimination Laws,  
Violation of California's Intentional  
Infliction of Emotional Distress Laws,  
Violation of California's Invasion of Privacy  
Laws, Violation of California's Unlawful Use  
of Personal Information Laws, Violation of  
California's Online Harassment Laws,  
Violation of California's Online Defamation  
Laws, Violation of California's Online  
Impersonation Laws, Violation of  
California's Cyberstalking Laws, Violation of  
California's Cyberbullying Laws, Violation  
of California's Privacy Rights Laws,  
Violation of California's Right to Privacy  
Laws, Copyright Infringement

1 Plaintiff, Gurpreet Singh, files this Complaint against Defendant, Akshay Kumar, Tiger Shroff,  
 2 Disha Patani, Mouni Roy, Gippy Grewal, Jaswinder Singh Bains(Jazzy B), Salman Khan, Katrina  
 3 Kaif, Neha Sharma, Aisha Sharma, Diljit Dosanjh, Sargun Mehta, John Abraham, Rakul Preet,  
 4 Kiara Advani, Mishaal Advani, Nidhi Agrewal, Anil Kapoor, Sonal Chauhan, Priyanka Chopra  
 5 Jonas, Avneet Kaur, Ravi Dubey, Ranveer Singh, Deepika Padukone, Neha Kakkar, Anushka  
 6 Sharma, Virat Kohli, Zareen Khan, Gauhar Khan, Parineeti Chopra, Shehnaz Gill, Sidharth  
 7 Malhotra, Ranbir Kapoor, Alia Bhatt, Kareena Kapoor Khan, Saif Ali Khan (hereinafter referred  
 8 to as "Defendant") and alleges as follows:  
 9

## 10 I. PARTIES

- 11 1. Gurpreet Singh is a citizen and resident of Contra Costa County.
- 12
- 13
- 14 2. Upon information and belief, Akshay Kumar, Tiger Shroff, Disha Patani, Mouni Roy, Gippy  
 15 Grewal, Jaswinder Singh Bains(Jazzy B), Salman Khan, Katrina Kaif, Neha Sharma, Aisha  
 16 Sharma, Diljit Dosanjh, Sargun Mehta, John Abraham, Rakul Preet, Kiara Advani, Mishaal  
 17 Advani, Nidhi Agrewal, Anil Kapoor, Sonal Chauhan, Avneet Kaur, Ravi Dubey, Ranveer  
 18 Singh, Deepika Padukone, Neha Kakkar, Anushka Sharma, Virat Kohli, Zareen Khan, Gauhar  
 19 Khan, Parineeti Chopra, Shehnaz Gill, Sidharth Malhotra are a citizen and resident of India,  
 20 and defendant Priyanka Chopra Jonas, is a citizen and resident of Los Angeles.  
 21
- 22

## 23 II. JURISDICTION AND VENUE

- 24
- 25 3. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332 based  
 26 on diversity of citizenship and the amount in controversy. Personal jurisdiction exists over the  
 27 defendants due to their harmful conduct directed towards the plaintiff in California. This  
 28

1 Court also has supplemental jurisdiction over related state law claims arising from the same  
2 facts as the federal claims.  
3

- 4
- 5 4. This action is filed in the United States District Court for the Northern District of California,  
6 San Francisco Division, as the harmful conduct, including defamation, impersonation, and  
7 unauthorized use of the plaintiff's likeness, was experienced by the plaintiff throughout the  
8 state of California. The plaintiff's residence and the effects of the defendants' actions, causing  
9 harm to the plaintiff's reputation, emotional well-being, and personal relationships, were felt  
10 within the Northern District of California. The substantial connections between the  
11 defendants' conduct and the harm suffered by the plaintiff throughout the state of California  
12 make this district the appropriate venue for the adjudication of this matter.  
13

14

15

16 **III. FACTUAL ALLEGATIONS**

- 17 1. The defendants, have engaged in the unauthorized use of the plaintiff's likeness,  
18 obtained from his Instagram account "gurpreetsingh23065," without his consent,  
19 in violation of his right to control the commercial use of his identity and likeness.  
20
- 21
- 22 2. The defendants have impersonated the plaintiff on various online platforms,  
23 including social media, by creating false accounts and posting defamatory content  
24 that harms the plaintiff's reputation and credibility.  
25  
26  
27  
28

1           3. The defendants have orchestrated a malicious campaign to defame the plaintiff  
2           among the public, spreading false and damaging information to tarnish his  
3           character and reputation, with the intent to prevent him from engaging in  
4           relationships with females of his preference.  
5

6  
7           4. The defendants' actions have resulted in severe harassment, emotional distress,  
8           and reputational harm to the plaintiff, causing him significant distress and  
9           suffering.  
10

11  
12           5. The defendants have engaged in illegal surveillance of the plaintiff, monitoring his  
13           activities, interactions, and personal information without his consent, violating his  
14           right to privacy and subjecting him to constant scrutiny and invasion of his  
15           personal space.  
16

17  
18           6. The defendants have manipulated crowds and orchestrated situations to isolate the  
19           plaintiff, surround him with seniors, married individuals, or male acquaintances,  
20           with the purpose of restricting his social interactions and relationships with  
21           females of his preference.  
22

23  
24           7. The defendants' conduct constitutes intentional infliction of emotional distress,  
25           defamation, invasion of privacy, unauthorized use of likeness, and other  
26           intentional torts, causing significant harm and damage to the plaintiff's personal  
27           and professional life.  
28

1  
2 8. The plaintiff has suffered financial losses, reputational damage, emotional distress,  
3 and other harms as a direct result of the defendants' malicious and unlawful  
4 actions.

5  
6  
7 9. The defendants' unauthorized use of the plaintiff's likeness and impersonation on  
8 various online platforms has caused confusion among the public, leading to a  
9 misrepresentation of the plaintiff's identity and damaging his credibility and  
10 reputation.

11  
12  
13 10. The defendants' defamatory campaign, aimed at tarnishing the plaintiff's character  
14 and reputation, has resulted in the loss of opportunities, relationships, and social  
15 standing for the plaintiff, impacting his personal and professional life negatively.

16  
17  
18 11. The defendants' actions have created a hostile and intimidating environment for  
19 the plaintiff, with constant surveillance, harassment, and defamation tactics  
20 designed to isolate and harm him emotionally and psychologically.

21  
22  
23 12. The defendants' intentional interference with the plaintiff's relationships and  
24 social interactions constitutes a violation of his rights to freedom of association  
25 and privacy, causing significant distress and harm to his well-being.  
26  
27  
28

1 13. The defendants' conduct demonstrates a pattern of malicious intent and deliberate  
2 harm towards the plaintiff, with the clear objective of undermining his personal  
3 autonomy, reputation, and social connections.  
4

5  
6 14. The plaintiff has suffered severe emotional distress, mental anguish, and  
7 reputational damage as a direct result of the defendants' wrongful actions, entitling  
8 him to full and fair compensation for the harm inflicted upon him.  
9

10  
11 15. The defendants' campaign of defamation, impersonation, and unauthorized use of  
12 the plaintiff's likeness constitutes a deliberate and malicious effort to harm the  
13 plaintiff's reputation and well-being, warranting legal action and remedies to  
14 address the harm caused.  
15

16  
17 16. The defendants have systematically social isolation imposed on Gurpreet Singh by  
18 the defendant's, depriving him of a normal social life and relationships.  
19

20  
21 17. The callous disregard for Gurpreet Singh's mental health and well-being, evident  
22 in the targeted attacks and defamation orchestrated by the defendants.  
23

24  
25 18. The egregious invasion of Gurpreet Singh's privacy and dignity through the  
26 unauthorized use of his personal information and likeness for malicious purposes.  
27  
28

1 19. The defendants have created an aggressive and hostile environment to intimidate  
2 and harm Gurpreet Singh, causing him significant distress.

3  
4  
5 20. The intentional disruption of Gurpreet Singh's peace of mind and sense of security  
6 through continuous and targeted acts of harassment.

7  
8  
9 21. The defendants have caused a systematic isolation and alienation of Gurpreet  
10 Singh from social circles and relationships, leading to profound emotional and  
11 psychological impact.

12  
13  
14 22. The propagation of a false and damaging narrative about Gurpreet Singh by the  
15 defendants, tarnishing plaintiffs reputation and credibility in the public eye.

16  
17  
18 **CAUSE OF ACTION**

19  
20 23. Defamation: The Defendants' campaign to attack Gurpreet Singh's reputation  
21 constitutes defamation under California law. Defamation involves the publication  
22 of false statements that harm a person's reputation. In California, defamation is a  
23 civil wrong that can result in damages. (California Civil Code § 44; see also, Taus  
24 v. Loftus, 40 Cal. 4<sup>th</sup> 683 (2007))

25  
26  
27 24. Invasion of Privacy: The illegal surveillance and unauthorized use of Gurpreet  
28 Singh's personal information by the Defendants amount to invasion of privacy



1 under California law. Invasion of privacy encompasses various forms of intrusion  
2 into an individual's private affairs. (California Constitution, Article 1, Section 1;  
3 see also, *Shulman v. Group W Productions, Inc.*, 18 Cal. 4<sup>th</sup> 200 (1998)).  
4

5  
6 25. Intentional Infliction of Emotional Distress: The Defendants' deliberate and  
7 malicious conduct towards Gurpreet Singh, causing severe emotional distress,  
8 claims for intentional infliction of emotional distress under California law. This  
9 cause of action requires extreme and outrageous conduct that intentionally or  
10 recklessly causes severe emotional distress. (California Civil Code § 46; see also,  
11 *Christensen v. Superior Court*, 54 Cal. 3d 868 (1991))  
12

13  
14 26. False Light: The Defendants' dissemination of false information and  
15 impersonation of Gurpreet Singh leads to a claim for false light invasion of privacy  
16 under California law. False light involves the publication of highly offensive and  
17 false information that places an individual in a false light. (California Civil Code §  
18 45; see also, *M.G. v. Time Warner, Inc.*, 89 Cal. App. 4<sup>th</sup> 623 (2001))  
19

20  
21 27. Cyberbullying: The cyberbullying and harassment orchestrated by the Defendants  
22 and micro influencers against Gurpreet Singh violates federal laws such as the  
23 Computer Fraud and Abuse Act (CFAA) and California's cyberbullying statutes.  
24 The CFAA prohibits unauthorized access to computer systems, while California  
25 laws address cyberbullying and online harassment. (18 U.S.C. § 1030; California  
26 Penal Code § 653.2; see also, *United States v. Nosal*, 676 F.3d 854 (9<sup>th</sup> Cir. 2012)).  
27  
28



1  
2 28. Intentional Interference with Contract: The interference in Gurpreet Singh's  
3 relationships by the Defendants claims for intentional interference with contract  
4 under California law. This cause of action requires intentional and unjustified  
5 interference with a contractual relationship, resulting in damages. (California Civil  
6 Code § 1708; see also, Della Penna v. Toyota Motor Sales, U.S.A., Inc., 11 Cal. 4<sup>th</sup>  
7 376 (1995))  
8

9  
10 29. False Advertising: If the Defendants have spread false information about Gurpreet  
11 Singh with the intent to deceive the public, it constitute false advertising under  
12 federal and California laws. The Lanham Act (15 U.S.C. § 1125) and California's  
13 False Advertising Law (California Business and Professions Code § 17500)  
14 prohibit false or misleading advertising that deceives consumers or harms  
15 competitors.  
16  
17

18  
19 30. Intentional Misrepresentation: The Defendants' dissemination of false allegations  
20 and impersonation of Gurpreet Singh support a claim for intentional  
21 misrepresentation under California law. Intentional misrepresentation involves  
22 making false statements with the intent to deceive another party, leading to harm  
23 or damages. (California Civil Code § 1710; see also, Engalla v. Permanente  
24 Medical Group, Inc., 15 Cal. 4<sup>th</sup> 951 (1997))  
25  
26  
27  
28

1 31. Conspiracy: The Defendants have conspired to engage in the harmful conduct  
2 against Gurpreet Singh, a claim for civil conspiracy, which pursued under federal  
3 and California laws. Conspiracy involves an agreement between two or more  
4 parties to commit an unlawful act or achieve an unlawful purpose, resulting in  
5 damages. (California Civil Code § 1714; see also, Halberstam v. Welch, 705 F.2d  
6 472 (D.C. Cir. 1983))  
7

8  
9 32. Intentional Torts: The Defendants' intentional and harmful actions towards  
10 Gurpreet Singh give rise to various intentional tort claims under both federal and  
11 California laws. Intentional torts, such as assault, battery, and intentional infliction  
12 of emotional distress, involve deliberate and purposeful conduct that causes harm  
13 or injury to another individual. These claims seek to hold the wrongdoer  
14 accountable for their intentional actions and may result in damages. (See  
15 Restatement (Second) of Torts; California Civil Code)  
16  
17

18  
19 33. Unfair Competition: The Defendants' deceptive and unfair practices aimed at  
20 harming Gurpreet Singh's reputation and livelihood may violate federal and  
21 California laws governing unfair competition. The Federal Trade Commission Act  
22 (15 U.S.C. § 45) and California's Unfair Competition Law (California Business  
23 and Professions Code § 17200) prohibit unfair, deceptive, or fraudulent business  
24 practices that harm consumers or competitors.  
25  
26  
27  
28

1 34. Civil Rights Violations: The Defendants' actions against Gurpreet Singh involve  
2 discrimination, harassment, or other civil rights violations, which is a grounds for  
3 pursuing civil rights claims under federal and California laws. Civil rights laws,  
4 such as the Civil Rights Act of 1964 (42 U.S.C. § 2000e) and California's Fair  
5 Employment and Housing Act (California Government Code § 12900), protect  
6 individuals from discrimination based on protected characteristics such as race,  
7 gender, or religion.  
8

9  
10 35. Stalking: The Defendants' actions towards Gurpreet Singh involve a pattern of  
11 behavior that constitutes stalking, which grounds for pursuing legal action under  
12 federal and California stalking laws. Stalking involves willfully and maliciously  
13 harassing or following another person, causing fear or emotional distress. Federal  
14 stalking laws include the Violence Against Women Act (18 U.S.C. § 2261A) and  
15 California Penal Code § 646.9 addresses stalking offenses within the state.  
16  
17

18  
19 36. Identity Theft: The Defendants have engaged in the unauthorized use of Gurpreet  
20 Singh's personal information or likeness for fraudulent purposes, it constitute  
21 identity theft under federal and California laws. Identity theft involves the  
22 unlawful use of another person's identifying information for financial gain or other  
23 unlawful purposes. The federal Identity Theft and Assumption Deterrence Act (18  
24 U.S.C. § 1028) and California Penal Code § 530.5 address identity theft offenses.  
25  
26  
27  
28

1 37. Harassment: The Defendants' persistent and targeted actions towards Gurpreet  
2 Singh may amount to harassment under federal and California laws. Harassment  
3 involves a course of conduct directed at an individual that serves no legitimate  
4 purpose and causes substantial emotional distress. Federal harassment laws include  
5 Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e) and California Penal  
6 Code § 646.9 addresses harassment offenses within the state.  
7

8  
9 38. Cyberstalking: The Defendants' use of electronic communication to engage in a  
10 pattern of harassing behavior towards Gurpreet Singh may constitute cyberstalking  
11 under federal and California laws. Cyberstalking involves the use of electronic  
12 devices or online platforms to repeatedly harass, intimidate, or threaten an  
13 individual. Federal cyberstalking laws include the Interstate Stalking Punishment  
14 and Prevention Act (18 U.S.C. § 2261A) and California Penal Code § 646.9  
15 specifically addresses cyberstalking offenses within the state.  
16  
17

18  
19 39. Emotional Distress Damages: Gurpreet Singh is entitled to seek damages for  
20 emotional distress caused by the Defendants' malicious conduct under federal and  
21 California laws. Emotional distress damages are available in civil lawsuits where  
22 the plaintiff has suffered severe emotional harm as a result of the defendant's  
23 wrongful actions. Courts may award compensation for emotional distress based on  
24 the severity and impact of the distress experienced.  
25  
26  
27  
28

1 40. Civil Conspiracy: The Defendants have conspired to engage in unlawful conduct  
2 against Gurpreet Singh, a claim for civil conspiracy which is pursued under federal  
3 and California laws. Civil conspiracy involves an agreement between two or more  
4 parties to commit an unlawful act or achieve an unlawful purpose, resulting in  
5 harm or damages to the victim. Civil conspiracy claims seek to hold all parties  
6 involved in the conspiracy accountable for their actions.  
7

8  
9  
10 41. Negligent Infliction of Emotional Distress: The Defendants' actions towards  
11 Gurpreet Singh were negligent and resulted in emotional harm, Gurpreet Singh  
12 have a claim for negligent infliction of emotional distress under California law.  
13 Negligent infliction of emotional distress occurs when a person's negligent actions  
14 cause another individual to suffer emotional harm. (See *Molien v. Kaiser*  
15 *Foundation Hospitals*, 27 Cal. 3d 916 (1980))  
16

17  
18 42. Trespass to Chattels: The Defendants unlawfully interfered with Gurpreet Singh's  
19 personal property, such as his electronic devices or online accounts, Plaintiff have  
20 a claim for trespass to chattels under California law. Trespass to chattels involves  
21 intentional interference with another person's personal property, resulting in harm  
22 or deprivation of use. (See *Intel Corp. v. Hamidi*, 30 Cal. 4<sup>th</sup> 1342 (2003))  
23

24  
25  
26 43. Unlawful Surveillance: The Defendants engaged in unauthorized surveillance of  
27 Gurpreet Singh, it constitute a violation of federal and California laws governing  
28

1 unlawful surveillance. Unlawful surveillance involves the unauthorized monitoring  
2 or recording of an individual's private activities without consent. Federal laws  
3 such as the Electronic Communications Privacy Act (18 U.S.C. § 2511) and  
4 California Penal Code § 632 address unlawful surveillance offenses.  
5

6  
7 44. Intentional Interference with Prospective Economic Advantage: If the Defendants'  
8 actions were intended to disrupt Gurpreet Singh's business relationships or  
9 economic opportunities, Plaintiff have a claim for intentional interference with  
10 prospective economic advantage under California law. This cause of action  
11 involves intentional interference with another person's prospective economic  
12 relationships or opportunities, resulting in financial harm. (See *Korea Supply Co.*  
13 *v. Lockheed Martin Corp.*, 29 Cal. 4<sup>th</sup> 1134 (2003)).  
14

15  
16  
17 45. Violation of Right to Publicity: The Defendants have used Gurpreet Singh's  
18 name, image, or likeness for commercial purposes without his consent, it  
19 constitute a violation of his right to publicity under California law. The right to  
20 publicity protects an individual's right to control the commercial use of their  
21 identity and likeness. California Civil Code § 3344 provides statutory protection  
22 for the right to publicity, allowing individuals to seek damages for unauthorized  
23 use of their persona.  
24

25  
26  
27 46. Violation of California's Anti-Cyberharassment Laws: California has specific laws  
28 that address cyberharassment and online harassment. The Defendants' actions

1 towards Gurpreet Singh constitute cyberharassment, Plaintiff have grounds to  
2 pursue legal action under California's anti-cyberharassment statutes. California  
3 Penal Code § 653.2 prohibits the electronic communication of messages with the  
4 intent to harass or annoy another person, providing legal recourse for victims of  
5 cyberharassment.  
6

7  
8 47. Violation of California's Consumer Protection Laws: If the Defendants engaged in  
9 deceptive or unfair business practices that harmed Gurpreet Singh as a consumer,  
10 Plaintiff have a claim under California's consumer protection laws. California's  
11 Unfair Competition Law (California Business and Professions Code § 17200) and  
12 Consumer Legal Remedies Act (California Civil Code § 1750) protect consumers  
13 from fraudulent, unfair, or deceptive business practices, allowing individuals to  
14 seek remedies for violations of their consumer rights.  
15

16  
17 48. Copyright Infringement: The Defendant's unauthorized use of the Plaintiff's  
18 content on social media platforms may constitute copyright infringement under  
19 federal law. The Copyright Act of 1976 protects original works of authorship,  
20 including photographs and other creative content. In Perfect 10, Inc. v.  
21 Amazon.com, Inc., 508 F.3d 1146 (9<sup>th</sup> Cir. 2007), the court addressed issues of  
22 copyright infringement in the context of online content.  
23  
24  
25

26 PRAYER:  
27  
28



1 “WHEREFORE, Plaintiff respectfully prays for the following pre-judgment and post-  
2 judgment relief:

3  
4 Pre-Judgment Relief:

5  
6  
7 49. An award of \$800 billion dollars in compensatory damages for the severe  
8 emotional distress, financial harm, and reputational damage suffered as a result of  
9 the defendants’ malicious and intentional conduct.

10  
11  
12 50. Punitive damages in an amount to be determined by the court, to punish the  
13 defendants for their egregious behavior and deter future misconduct.

14  
15 51. Injunctive relief to prohibit the defendants from further engaging in cyberbullying,  
16 harassment, defamation, and any other harmful actions towards the plaintiff.

17  
18 Post-Judgment Relief:

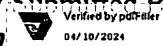
19  
20 52. Ongoing compensatory damages for any continuing harm suffered by the plaintiff  
21 as a result of the defendants’ actions.

22  
23  
24 53. Attorneys’ fees and costs incurred in bringing this action.

25  
26  
27 54. Any other relief that the court deems just and proper in the circumstances.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Respectfully Submitted By:



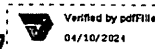
Gurpreet Singh  
2864 Hilltop Mall Road  
Richmond, California 94806  
Preet2325@yahoo.com  
Plaintiff, Pro Per

Date: April 9, 2024

**DEMAND FOR JURY TRIAL**

Pro Se Plaintiff, Gurpreet Singh, demands a jury trial for all the triable issues and facts.

Respectfully submitted by:



Gurpreet Singh  
2864 Hilltop Mall Road  
Richmond, California 94806  
Preet2325@yahoo.com  
Plaintiff, Pro Per

Date: April 9, 2024